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16 Attorneys for Defendant NATIONAL ASSOCIATION  
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25 Attorneys for Defendants LAWRENCE IRA PROZAN  
26 DBA PROZAN FINANCIAL SERVICES,  
27 MULTI-FINANCIAL SECURITIES CORP.

28 UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

REGINA JIMENEZ,

Plaintiff,

v.

NATIONAL ASSOCIATION OF SECURITIES  
DEALERS, LAWRENCE IRA PROZAN DBA  
PROZAN FINANCIAL SERVICES, MULTI-  
FINANCIAL SECURITIES CORP.,

Defendants.

CASE NO. 07-03360-MJJ

**STIPULATION AND [PROPOSED]  
ORDER REGARDING PLAINTIFF'S  
AMENDMENT OF COMPLAINT AND  
DEFENDANTS' RESPONSE TO SAME**

1 The parties to this matter, plaintiff Regina Jimenez, defendant National Association of  
2 Securities Dealers, Inc. ("NASD"), and defendants Lawrence Ira Prozan DBA Prozan Financial  
3 Services and Multi-Financial Securities Corporation (together, "Multi-Financial") (NASD and Multi-  
4 Financial are referred to collectively herein as "Defendants") by and through their counsel, hereby  
5 stipulate as follows:

6 WHEREAS, Ms. Jimenez filed her "Complaint to Vacate Arbitration Decision" (the "Original  
7 Complaint") on June 26, 2007, challenging an interim arbitration decision; and

8 WHEREAS, the Defendants' responses to Ms. Jimenez's Original Complaint are not yet due  
9 to be filed with the Court; and

10 WHEREAS, the panel in the underlying arbitration entered and served a final award in that  
11 arbitration on July 24, 2007; and

12 WHEREAS, Ms. Jimenez desires to amend her Original Complaint in light of the final  
13 arbitration award entered and served by the panel on July 24, 2007; and

14 WHEREAS, the Ms. Jimenez and the Defendants wish to avoid unnecessary expense and  
15 inconvenience;

16 THEREFORE, MS. JIMENEZ AND DEFENDANTS STIPULATE AS FOLLOWS:

17 1. the Defendants need not answer or otherwise respond to Ms. Jimenez's Original  
18 Complaint, and may instead respond solely to any amended complaint that Ms. Jimenez may file, as  
19 they deem appropriate.

20 2. Ms. Jimenez will file and serve her amended complaint in this matter, if any, on or  
21 before August 10, 2007.

22 3. Defendants will answer or otherwise respond to Ms. Jimenez's amended complaint (if  
23 any) on or before September 7, 2007.

24 SO STIPULATED.

25 DATED: July 30, 2007

LAW OFFICES OF STANLEY G. HILTON

26 By:   
27 Stanley G. Hilton

28 Attorneys for Plaintiff REGINA JIMENEZ

1 DATED: July \_\_, 2007

GIBSON, DUNN & CRUTCHER LLP

2  
3 By: \_\_\_\_\_  
Ethan D. Dettmer

4 Attorneys for Defendant NATIONAL ASSOCIATION  
5 OF SECURITIES DEALERS, INC.

6 DATED: July 30, 2007

7 EDGERTON AND WEAVER LLP

8 By: \_\_\_\_\_  
9 Samuel Y. Edgerton, III

10 Attorneys for Defendants LAWRENCE IRA PROZAN  
11 DBA PROZAN FINANCIAL SERVICES,  
12 MULTI-FINANCIAL SECURITIES CORP.

13  
14  
15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 DATED: \_\_\_\_\_, 2007

17 \_\_\_\_\_  
18 The Honorable Martin J. Jenkins  
United States District Judge

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1 DATED: July 30, 2007

GIBSON, DUNN & CRUTCHER LLP

2  
3 By: \_\_\_\_\_ /s/  
Ethan D. Dettmer

4 Attorneys for Defendant NATIONAL ASSOCIATION  
5 OF SECURITIES DEALERS, INC.

6 DATED: July \_\_, 2007

EDGERTON AND WEAVER LLP

7  
8 By: \_\_\_\_\_  
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15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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18 The Honorable Martin J. Jenkins  
United States District Judge

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